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Attorney in pro se and for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA,
SOUTHERN DIVISION**

LISA LIBERI, et al,

Plaintiffs,

vs.

ORLY TAITZ, et al,

Defendants.

CIVIL ACTION NUMBER:

8:11-cv-00485-AG (AJW)

**PLAINTIFFS EVIDENTARY
OBJECTIONS TO DEFENDANT,
ORLY TAITZ'S REQUEST FOR
JUDICIAL NOTICE OF EXHIBIT
"6"**

Date of Hearing: June 13, 2011
Time of Hearing: 10:00 a.m.
Location: Courtroom 10D

**PLAINTIFFS EVIDENTARY OBJECTIONS TO DEFENDANT
ORLY TAITZ'S REQUEST FOR JUDICIAL NOTICE OF
EXHIBIT "6", DOCKET ENTRY NO. 210-1**

Plaintiffs, Philip J. Berg, Esquire [hereinafter at times "Berg"]; Lisa Ostella [hereinafter at times "Ostella"]; Go Excel Global; Lisa Liberi [hereinafter at times "Liberi"]; and The Law Offices of Philip J. Berg by and through their undersigned counsel, Philip J. Berg, Esquire, Object pursuant to the Federal Rules of Evidence

1 103, to Defendant, Orly Taitz's Request for Judicial Notice of Exhibit "6",
2 appearing as Docket No. 210-1.
3

4 **PLAINTIFFS EVIDENTARY OBJECTIONS**

5 1. On May 26, 2011, Defendant Orly Taitz by and through her Attorney,
6 Jason Q. Marasigan, Esquire, filed a Request for Judicial Notice of three [3]
7 Exhibits. *See* Docket Entry Nos 210 and 201-1. In particular, Exhibit "6" which
8 supposedly purports a Bankruptcy Filing. Plaintiffs OBJECT to Exhibit "6" as it is
9 unauthenticated in violation of Federal Rules of Evidence [*"Fed. R. Evid."*] 901
10 and 1005; it is hearsay in violation of *Fed. R. Evid.* 801 and is inadmissible
11 pursuant to *Fed. R. Evid.* 802; and Defendant Orly Taitz lacks personal knowledge
12 in violation of *Fed. R. Evid.* 602.
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16 Respectfully submitted,
17
18

19 Dated: May 31, 2011

20 /s/ Philip J. Berg
21 Philip J. Berg, Esquire
22 Pennsylvania I.D. 9867
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Attorney for Plaintiffs

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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA,
SOUTHERN DIVISION**

LISA LIBERI, et al,	:	CIVIL ACTION NUMBER:
Plaintiffs,	:	8:11-cv-00485-AG (AJW)
vs.	:	PLAINTIFFS CERTIFICATE OF
ORLY TAITZ, et al,	:	SERVICE
Defendants.	:	

I, Philip J. Berg, Esquire, hereby certify a true and correct copy of Plaintiffs
Evidentiary Objections to Defendant Orly Taitz's Request for Judicial Notice of Exhibit
"6", was served through the ECF filing system and/or mail as indicated below, this 31st
day of May 2011 upon the following:

Jason Q. Marasigan
Dack Marasigan, LLC
23041 Avenida de la Carlota, Suite 300
Laguna Hills, CA 92653
Email: jmarasigan@dacklaw.com
Served via the ECF Filing System

Attorney for Defendant, Orly Taitz, Esquire

1 Orly Taitz
2 26302 La Paz Ste 211
3 Mission Viejo, CA 92691
4 Ph: [\(949\) 683-5411](tel:(949)683-5411)
5 Fax: (949) 586-2082
6 Email: orly.taitz@gmail.com and
7 Email: dr_taitz@yahoo.com
8 Served via the ECF Filing System

9 *Attorney for Defendant Defend our Freedoms Foundation, Inc.*

10 The Sankey Firm, Inc.
11 2470 Stearns Street #162
12 Simi Valley, CA 93063
13 By USPS Mail with Postage fully prepaid

14 Neil Sankey
15 P.O. Box 8298
16 Mission Hills, CA 91346
17 By USPS Mail with Postage fully prepaid

18 Sankey Investigations, Inc.
19 P.O. Box 8298
20 Mission Hills, CA 91346
21 By USPS Mail with Postage fully prepaid

22 /s/ Philip J. Berg

23 Philip J. Berg, Esquire
24 Pennsylvania I.D. 9867
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